

vectors (MV1, MV2, MV3, MV4) for second objects (8\*8)" and "generating prediction errors in dependence on said second motion vectors only". However, despite this argument, the above rejection has been maintained.

In maintaining the above rejection, it was stated that the method disclosed in section II of de Haan, especially the part after page 373, right column, line 9, teaches an alternative filtering process. However, after carefully reviewing this portion of de Haan et al., the Applicant still does not see what this has to do with the presently recited "filtering (MVPF) every occurrence of said first motion vectors (MVc, MVl, MVr, MVa, MVb) to obtain second motion vectors (MV1, MV2, MV3, MV4) for second objects (8\*8)".

On page 373, right column, starting from line 9, de Haan et al. discloses an option is found that prevents vectors that did not result from the estimation from being generated. Further, in lines 7-8, de Haan et al. make it clear that the filtering only eliminates block boundaries from the vector field without blurring contours.

Based on the above disclosure, it is evident that de Haan et al. neither teaches nor suggests the presently recited "filtering (MVPF) every occurrence of said first motion vectors (MVc, MVl, MVr, MVa, MVb) to obtain second

motion vectors (MV1, MV2, MV3, MV4) for second objects (8\*8)", as required by the claims. Therefore, it is respectfully submitted that this feature is distinguishable over Ng in view of de Haan et al.

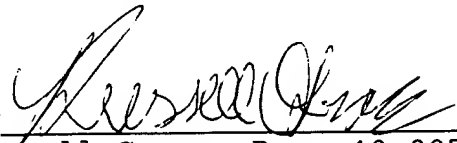
In maintaining the above rejection, it is now being stated that column 5, lines 39-64, of Ng disclose the presently recited "generating prediction errors in dependence on said second motion vectors only".

However, in column 5, lines 39-64, Ng only discloses a predicted field is generated using motion vectors and data from the prior I field, and the predicted field is subtracted from the current field on a pixel by pixel basis to generate residues. Based on this disclosure, it is evident that Ng neither teaches nor suggests the presently recited "generating prediction errors in dependence on said second motion vectors only", as required by the claims. Therefore, it is also respectfully submitted that this feature is distinguishable over Ng in view of de Haan et al.

In view of the above-described distinctions, it is respectfully submitted that the invention of claims 1-9 is not obvious Ng in view of de Haan et al. Therefore, it is respectfully requested that the above rejection be reconsidered and withdrawn so that the present application may proceed to issue.

The Commissioner is hereby authorized to credit any overpayment or charge any fee (except the issue fee) to Account No. 14-1270.

Respectfully submitted,

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